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July 12, 2024

BY ECF

Hon. Pamela K. Chen United States District Court, EDNY 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Stephen Burton Indictment # 22 CR 79 (PKC)

Dear Judge Chen;

I represent the defendant in the above noted matter. This matter is on for status conference on Monday, July 15, 2024.

I have conferred with AUSA Benjamin Weintraub, and we are attempting to resolve some technical discovery issues which are preventing my client from reviewing all the discovery. We therefore respectfully request that the Court adjourn the conference for approximately 30 days to allow us to resolve these issues and to continue plea negotiations. Other than August 9, 14, 15, and 16, we are both available at the Court's convenience.

This is a joint request. The defense agrees that the time until the next date should be excluded from calculations under the Speedy Trial Act.

Thank you for your courtesy and consideration.

Respectfully yours,

JOHN S. WALLENSTEIN

John S. Wallenstein

JSW/hs

cc: AUSA Benjamin L. Weintraub (by ECF)